

John T. Scott, III  
Vice President &  
Deputy General Counsel  
Regulatory Law



Verizon Wireless  
1300 I Street, N.W.  
Suite 400 West  
Washington, DC 20005

Phone 202 589-3760  
Fax 202 589-3750  
john.scott@verizonwireless.com

August 21, 2002

Mr. Thomas J. Sugrue  
Chief, Wireless Telecommunications Bureau  
Federal Communications Commission  
445 - 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

RECEIVED

SEP - 9 2002

Re: Unintentional 911 Calls from Mobile Phones

Dear Mr. Sugrue:

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

You have asked Verizon Wireless to outline the efforts the company is making to reduce unintentional "911" calls made from wireless phones to public safety agencies. We agree with your assessment that wireless handset vendors, carriers and public safety agencies are working to address this issue. Verizon Wireless has examined the possible causes of the problem and the extent to which it may exist in our network, and we have taken steps to reduce the likelihood of unintentional emergency calls.

We agree that most if not all accidental 911 calls are generated when the "1" or the "9" key on phones designed with a "one-touch emergency 911 dialing" feature is accidentally pressed while the phone is in the user's pocket, purse or briefcase, or is carried on the user's belt. We believe this problem is not widespread among Verizon Wireless' equipment base.

First, Verizon Wireless has not required handset vendors to provide the one-touch emergency 911 dialing feature. Some vendors began including this feature in a few models several years ago, but these models comprise only eight of the 32 models we offer for purchase. Three quarters of the models we offer do not have a one-touch feature.

Second, in January 2002, we verbally contacted all of our vendors that provided models with the one-touch feature and requested them to confirm that they ship the handsets to us with the feature deactivated. In March 2002, we followed up with a written request to all vendors to ensure that they shipped the handsets with the feature turned off, and all vendors confirmed that they did so, with one exception. This one model, manufactured by Samsung, has a one-touch feature that Samsung advises cannot be disabled. However, because this phone has a "clamshell" design in which the buttons are covered by the top of the clamshell, it is extremely unlikely to generate unintentional calls. In addition, Samsung has advised that it is developing a software change to remove this feature.

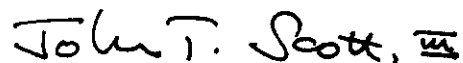
Third, we have decided that we will not offer any new handset model that has the one-touch feature at all. We have thus modified our product specifications so that they prohibit manufacturers from including the one-touch emergency 911 dialing feature in future models. This includes removing the red coloring of the number "9" key on the keypad. This action ensures that future products will not be capable of unintentional calls.

We appreciate NENA's suggestions as to itemizing 911 calls on customers' bills and providing customers with additional information. We are not able to implement the first suggestion given limitations in most of our billing systems that do not include call details of free calls such as 911 calls on customers' bills. Because phones are not provided to customers with an activated one-touch 911 feature, we have not provided general information to all our customers (in addition to information already provided in the user guide as to this optional feature). Given what we believe is an issue for a limited number of handsets, we determined that a broad communication would be confusing to customers. In response to your inquiry, however, we are considering the suggestion that we develop such a communication as well as how the information could be provided.

PSAPs' expanded rollout of E911 Phase I will also help to minimize the problem of unintentional 911 calls. Verizon Wireless now provides Phase I service to nearly 1,500 PSAPs nationwide, representing a significant portion of our service area. We are working to deploy this service in many more communities. With Phase I capability, PSAPs can identify the mobile number of the caller and place a return call, thereby alerting the customer that he or she may have inadvertently dialed 911.

Please let me know if we can provide you with additional information.

Sincerely,

A handwritten signature in black ink that reads "John T. Scott, III". The signature is written in a cursive, slightly stylized font. The "J" is large and loops around the "o". The "T" is simple. "Scott" is written in a clear cursive, and "III" is written at the end.

John T. Scott, III

cc: Andra Cunningham  
James R. Hobson, Esq.